

**FOR THE DISTRICT OF MARYLAND
at Greenbelt**

IN RE:

**ZACHAIR, LTD.,

Debtor.**

**Case No. 20-10691-LSS

(Chapter 11)**

**LAWRENCE A. KATZ, Plan Administrator,

Plaintiff**

v.

Adversary Proceeding 23-00014

**NABIL J. ASTERBADI, *et al.*,

Defendants.**

DECLARATION OF MAUREEN ASTERBADI

I, Maureen Asterbadi, do hereby declare and state as follows:

1. I am 75 years old.
2. I previously worked as an RN before getting married, and have not practiced in more than 30 years. Since getting married, I mainly spent my time on charity work, volunteering at my children's school, or in other part time jobs, but I primarily focused on being a homemaker and raising my children.
3. My husband, Dr. Nabil Asterbadi, and I own Zachair, Ltd. ("Zachair"), the Debtor in the litigation, as tenants by the entirety. We are also the sole shareholders.
4. I am a director of Zachair, but I am not and never have been involved in any of the operations, decisions or day-to-day affairs of managing it.

5. I would occasionally sign documents presented to me by my husband in my role as director, but I often did not read them or understand what I was signing.

6. I executed the Corporate Resolution attached as Exhibit 1 to this Declaration designating Dr. Asterbadi as the sole representative permitted to make decisions on behalf of Zachair in the bankruptcy as Debtor in Possession.

7. I was not consulted or advised of any of the decisions made for Zachair during the course of the bankruptcy.

8. I was not aware of what bankruptcy abandonment was until undersigned counsel explained the claim to me when they were retained last year.

9. I did not know that the Abandonment Notice was being prepared, nor was I told when it was filed.

10. I was not given the opportunity to read the Abandonment Notice prior to its filing and I did not read it afterwards.

11. I did not make any decisions on behalf of Zachair as Debtor in Possession.

12. I do not have any information regarding why Zachair waived its right to pursue the Avoidance Actions.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT PURSUANT TO 28 U.S.C. 1746.

Executed on November 3, 2023

/s/ Maureen Asterbadi